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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 DANIEL ANTHONY ANGUIANO ET AL,

14 Defendant.
15

Case No. 2:20-cr-00136-APG-BNW

**STIPULATION TO MODIFY
TRAVEL RESTRICTION
(Second Request)**

16 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
17 United States Attorney, and Kimberly Sokolich, Assistant United States Attorney, counsel for
18 the United States of America, and Rene L. Valladares, Federal Public Defender, and Heidi
19 Ojeda, Assistant Federal Public Defender, counsel for Daniel Anguiano, that the Court modify
20 his condition of release to allow for travel to the State of California.
21

22 The Stipulation is entered into for the following reasons:

23 1. On May 28, 2020, Mr. Anguiano appeared before Magistrate Judge Daniel J.
Albrechts and was released on a personal recognizance bond with certain conditions, including
24 a travel restriction limiting his travel to Clark County, Nevada. ECF No.'s 5 & 9.
25

26 2. Mr. Anguiano is requesting the ability to travel to the State of California to
acquire a copy of his birth certificate, so he can obtain a valid Nevada driver's license.

3. Counsel for Mr. Anguiano has spoken with Pretrial Services Officer Jessie Moorehead who does not oppose this modification to allow travel to the State of California with the U.S. Pretrial Services Office's prior approval.

4. The government has no objection to this requested modification.

5. This is the second stipulation to modify conditions of release filed herein.

DATED this 1st day of June 2022.

RENE L. VALLADARES
Federal Public Defender

By /s/ Heidi Ojeda

HEIDI OJEDA
Assistant Federal Public Defender

JASON M. FRIERSON
United States Attorney

By /s/ Kimberly Sokolich

KIMBERLY SOKOLICH
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:20-cr-00136-APG-BNW

Plaintiff,

ORDER

V.

DANIEL ANTHONY ANGUIANO ET AL,

Defendant.

Based on the pending Stipulation of counsel, and good cause appearing,

IT IS THEREFORE ORDERED that Mr. Anguiano's travel restriction be modified to allow him to travel to the State of California with the U.S. Pretrial Services Office's prior approval.

DATED this 2nd day of June 2022.

UNITED STATES DISTRICT JUDGE